

Littler Mendelson, P.C. 900 Third Avenue New York, NY 10022.3298

MEMO ENDORSED

Kelly M. Cardin 212.471.4420 direct 212.583.9600 main 347.745.3314 fax kcardin@littler.com

August 16, 2024

VIA ECF

The Honorable Kenneth M. Karas United States District Judge United States Courthouse 300 Quarropas Street White Plains, New York 10601-4150

Re: Heather Weddle v. CFA Institute Case No. 7:24-cv-05308 (KMK) The redactions, to the extent they are not opposed by Plaintiff, are approved.

SO ORDERED

Dated: September 3, 2024

Dear Judge Karas:

We represent Defendant CFA Institute in the above-referenced matter. We write in accordance with Your Honor's Individual Rules of Practice to respectfully request that Plaintiff's submission to the Court on August 14, 2024 (ECF 8) be redacted or filed under seal. On August 14, 2024, Plaintiff (who is proceeding pro se) filed an Opposition to Defendant's request for an extension of time to respond to the Complaint. As part of her Opposition, Plaintiff attached email correspondence between Defendant's in-house counsel and her attorneys regarding confidential settlement negotiations and offers. See ECF 8, Exhibit A. Defendant respectfully requests that such communication be restricted from public viewing. See Anderson v. Gm Motors & Shareholders, 21-cv-1006 (JMF)(JLC) (S.D.N.Y. May 13, 2021) ("It is well settled that the confidentiality of settlement negotiations outweighs the presumption of public access in most cases"); New Eng. Life Ins. Co. v. Doerr, 21-CV-11037 (PMH) (S.D.N.Y. Aug. 21, 2023) (ordering that Defendants papers, which contain sensitive information related to settlement, be filed under seal and restricted from public viewing). Defendant's proposed redacted filing is attached hereto as Exhibit A.

We appreciate your time and consideration.

Respectfully submitted,

/s/ Kelly M. Cardin

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